

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Amendment of Part 97 of the Commission's	)	
Amateur Radio Service Rules to Eliminate	)	RM - 10786
Morse Code Proficiency Testing Requirements	)	
For All Classes of Amateur Licenses	)	
	)	
To: The Commission	)	

Comments Of <[Thomas J. Foth](#)>

Given that the IARU has dropped the need to prove Morse proficiency prior to becoming licensed for all classes and privileges of amateur radio operation, I would encourage the Commission to consider the above reference petition and adopt it to Part 97 as expeditiously as possible. Further, I would encourage the Commission not to confuse or slow the matter of adoption by combining with this rules change other changes to Part 97.

I have been a licensed amateur radio operator for over 30 years. While I will admit that I remember fondly of contacts I made on CW while I had my Novice license, I would like to point out that my true enjoyment and most importantly contribution to my community came using SSB and FM modes.

As a teenager, I assisted in the recovery of aircrafts that crashed over a lake near our home, I organized and supported communications for my community's centennial celebration. I was active in the MIDCARS radio network on 7.258 MHz.

In college I activated my college's amateur radio station. We created a SkyWarn network. We provided communications for a March of Dimes Walk. We participated in the ARRL's Sweepstakes

and Field Day contests. As a result of these activities, we attracted students in the college's electronics program to amateur radio.

As an adult I have participated in providing communications for parades, road races, and the recovery of bodies from a building disaster.

I recount these experiences to point out that each one of them, all of high service value, were completed using SSB or FM. None were completed with CW. Moreover, it would have been impractical to support any of them (with the exception of the contests) with CW.

Morse code did not come easy to me as a teenager. Other things competed for my interest. But my love of the hobby and my interest in serving my community caused me to persevere and go through two failed tests to ultimately get my license.

The United States needs youth that are interested in communicating via radio in a structured way. Amateur radio instills operations discipline and the ability to maintain equipment. Even amateur radio's strictest "appliance operators" are far more technically capable than public service and citizen service radio users.

There is no need for the Commission to use the Morse proficiency requirement as a gateway to the full use of the service. Technical and operational testing requirements serve the service adequately and appropriate at this time in the history of two way radio communications. Specifically, there is no need to prevent youth from access to the service and to be directed to the easier use of the Internet. Note that the Internet does not serve the community in times of disaster. Recent natural and man-made disasters and infrastructure failures continue to demonstrate the need for as robust a complement of amateur radio operators as the service can attract and support.

Respectfully submitted,

Thomas J. Foth, WB9FWK  
5099 Madison Avenue  
Trumbull, CT 06611  
[fothtj@earthlink.net](mailto:fothtj@earthlink.net)